

1 PAUL J. SMOOT, SBN 160787  
2 **ANDERLINI, FINKELSTEIN, EMERICK & SMOOT**  
3 400 South El Camino Real, Suite 700  
4 San Mateo, California 94402  
5 Telephone (650) 348-0102  
6 Facsimile (650) 348-0962  
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8 Attorneys for Plaintiff  
9 **CONNIE L. BROWN**

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

11	CONNIE L. BROWN,	)	Case No. C04-1536 VRW
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Plaintiff, )  
v. )  
CITY AND COUNTY OF SAN )  
FRANCISCO, DEPARTMENT OF PUBLIC )  
WORKS )  
Defendants. )  
AM

Due to the nature and complexity of this case, *Armstrong* action [C01-2611 VRW] and the *Brown* action [C04-1536 VRW], the similarity of facts, witnesses, and legal issues in the *Armstrong* and *Brown* action and the overlapping discovery, at the Joint Case Management Conference, before the Honorable Vaughn R. Walker, the parties agreed to utilize the same discovery for both cases. Additionally, the parties stipulated to have expert discovery commence after the hearing on the motion for summary judgment.

This matter has been continued on several occasions before; predominantly due to major health issues with the parties or plaintiff's counsel: two neurosurgeries (Plaintiff Brown), spinal fusion and ruptured Achilles (Plaintiff's counsel).

The parties now seek a continuance for the following reasons: Due to the nature and complexity of this case, witness availability, including plaintiffs' limited ability to complete their

1 depositions, additional time is needed to address several outstanding discovery issues and prepare  
2 any dispositive motions. There are several key discovery issues that the parties are attempting to  
3 resolve informally without requiring court intervention. With the extension of time, it appears  
4 probable that the parties will be able to resolve their differences.

5 As a result, the parties request the discovery cut-off and hearing of dispositive motions be  
6 continued as set forth below.

7 **IT IS HEREBY STIPULATED** by and between the parties hereto, through their respective  
8 counsel as undersigned, that :

9 1. Non-expert discovery completion date be continued from the currently scheduled date  
10 of June 26, 2007, to November 13, 2007;

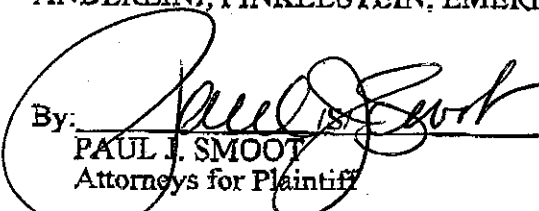
11 2. Filing for dispositive motions, including summary judgment, be continued from the  
12 currently scheduled date of June 29, 2007 to November 16, 2007;

13 3. Hearing on the dispositive motions, including summary judgment, be continued from  
14 the currently scheduled date of August 2, 2007, 2:00 p.m. to ~~Tuesday, December 21,~~ Thursday, December 20, at 2:00 p.m.;

15 4. Pre-trial conference be continued from the currently scheduled date of October 23,  
16 2007 to ~~Friday, March 7, 2008.~~ Tuesday, March 4, 2008 at 9:00 a.m.

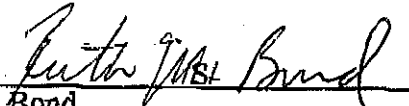
17  
18 Dated: 6/13/07

ANDERLINI, FINKELSTEIN, EMERICK & SMOOT

19  
20 By:   
21 PAUL J. SMOOT  
Attorneys for Plaintiff

22  
23 Dated: 6/13/07

SAN FRANCISCO CITY ATTORNEY'S OFFICE

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25 By:   
26 Ruth Bond  
27 Attorneys for Defendant CITY AND COUNTY OF  
28 SAN FRANCISCO and DEPARTMENT OF  
PUBLIC WORKS

ORDER

IT IS SO ORDERED.

Dated: 6/26/2007

JUDGE OF THE U.S. DISTRICT COURT

